

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,	:	CASE NO. 5:18CR00487
	:	
Plaintiff,	:	JUDGE DAN AARON POLSTER
	:	
v.	:	
	:	
LAMARR HILL,	:	MOTION FOR BOND AND
	:	MOTION TO ALLOW DEFENDANT
Defendant.	:	TO SELF-REPORT

Now comes Defendant, Lamarr Hill, by and through undersigned counsel, and respectfully submits the instant Motion for Bond and Motion to Allow Defendant to Self-Report.

Prior to the start of this case, Mr. Hill was convicted of Having Weapons Under Disability in the Summit County Court of Common Pleas, Case No. CR-2015-02-0360, and was serving a sentence of incarceration for that offense. Mr. Hill's Summit County sentence expired on or about June 16, 2019. Accordingly, Mr. Hill has indicated he has received correspondence from the Ohio Bureau of Prisons notifying him that the State's "hold" is no longer in effect.¹

In light of the above, Mr. Hill respectfully requests a bond be set in advance of the sentencing hearing currently scheduled for June 27, 2019 at 11:00 a.m., and that he be released from custody and permitted to "self-report" on a date and time to be determined by this Court following the imposition of sentence in this case. Attached as Exhibit A is a letter submitted on Mr. Hill's behalf wherein he requests this Court consider allowing his release on bond so as to enable him to see his family prior to be taken into federal custody. Mr. Hill understands he is facing

¹ Counsel for Mr. Hill has not had occasion to retrieve this document from Mr. Hill – for verification purposes, it will be provided to the Court as soon as possible and in Supplement to the instant Motion.

a minimum of five (5) years in prison for his conviction in this case, and he is prepared to face the consequences for his actions – Mr. Hill respectfully requests that he be released on bond and permitted to self-report thereafter so as to enable him to spend a period of time, however brief, with his children and grandmother (whose health has been deteriorating over time) before he is placed into federal custody.

WHEREFORE, Mr. Hill, through counsel, respectfully submits the instant Motion for Bond and Motion to Allow Defendant to Self-Report and respectfully requests it be GRANTED.

Respectfully submitted,

s/Jay Milano
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Attorney for Defendant,
Lamarr Hill

CERTIFICATE OF SERVICE

A copy of the foregoing Motion been served via CM/ECF electronic filing with the United States District Court for the Northern District of Ohio this 24 day of June 2019 upon:

Patrick Burke
Assistant U.S. Attorney
Office of the U.S. Attorney
801 West Superior Avenue, Suite 400
Cleveland, Ohio 44113

Respectfully submitted,

s/Jay Milano
Jay Milano, Esq. (0008204)

From: Denisha Clay denishac092192@icloud.com
Subject: Lamarr Hill
Date: June 13, 2019 at 10:40 AM
To: jm@milanolaw.com

DC

To Judge Dan Polster;

I Lamarr Hill is writing this letter to ask if you will grant me a bond. I know my actions cause me to be a predicament not only I have suffer from. I have 6 children which my 3 boys have upcoming birthdays this month on the 23rd and the 25th. If possible I would love to spend they birthdays with them. Also my grandmas birthday is on the 20th if this month since I been incarcerated her health hasn't been the best. I just want to show my family that I am sorry for putting them through this situation. I call home everyday to talk to my kids it hurts me to hear the stuff they involve in and I can't be apart. I take credit for my wrong doings and I'm ready to be the father I need to be. Just to spend a little time before I have to go away would be great. My boys is going to kindergarten this year. Also my first cousin I grew up with is getting married June 30 I would love to be there. Thanks for taking the time out to read this letter I appreciate it.

Sent from my iPhone

